

# Rules of Play & Dealing Procedures



#### TERMS USED IN THIS DOCUMENT

Dealer: The individual employed by the Casino that regulates the

play of the game, delivers the cards and takes or pay

wagers.

Player: Any individual other than the Dealer who plays the game.

Banker: Any individual who is financially responsible for the

payment of each Player or Dealer's primary wager.

Dealer-Banker: When the Dealer acts as the Banker. Player-Banker: When the Player acts as the Banker. Participants: Collectively the Dealer and all Players.

Commission: A fee collected by the casino from each Player whenever

the Player's hand wins. Generally, the fee is five percent of the amount won. Commissions are charged against the

Player's primary wager only.

#### **OVERVIEW**

"Emperor's Challenge Pai Gow Poker" (the "Game"), is a variation of traditional house-banked Pai Gow Poker currently offered in casinos. The Game is played in a similar fashion as traditional Pai Gow Poker but with two variations. Each of the variations may independently be allowed or disallowed by each casino. One variation has no affect on the other and visa versa.

#### Traditional Pai Gow Poker...

In traditional Pai Gow Poker, the Participants consist of one Dealer and at least one, but up to six Players. In most cases, the casino will permit Player-Bankers. If none of the Players choose to be the Banker, the Dealer acts as the Banker. If Player-Bankers are permitted, it is common practice for casinos to offer the opportunity to each Player to become the Banker in rotation, provided that, the Dealer-Banker is used at least once alternately between Player-Bankers.

A deck of fifty-two standard playing cards is used plus one joker for a total of fifty-three cards. Each Player places a wager in advance and competes against the Banker, who must be able to match all wagers. The Dealer delivers seven cards to all seven Participant positions regardless of whether all positions are in play. The total cards used to deal to all Participants equals forty-nine resulting in four unused cards. The four unused cards and any cards unused due to less than seven Participants are placed into the discard rack.

The seven card hand delivered to each Participant must be configured into two individual sets of cards – a two-card, low set and a five-card, high set. The two sets in each Player's hand are compared to the corresponding two sets in the Banker's hand. For a Player to win their primary wager, both

their five-card set and their two-card set must be of a greater ranking than the corresponding sets in the Banker's hand. The Player is paid one-to-one odds or "even money" less a commission in those establishments that charge the commission. For a Player to lose their primary wager, both their five-card set and their two-card set must be of a lower or equal ranking to the corresponding sets in the Banker's hand. If either one of the Player's sets is higher, and the other set is lower than or equal to the corresponding Banker's sets, the result is a tie or push whereby the Player neither wins nor loses their wager. This is a common occurrence in Pai Gow Poker and occurs approximately 41% of the time.

Strategy is used by each Player in configuring their hands through their selection of which two-card set and five-card set should be used to defeat the Banker's hand. It is common during the play of Pai Gow Poker for a Player to adjust their strategy and configure these sets in such a manner to achieve a tie result. This technique is sometimes considered to be a defensive strategy. The Dealer's strategy is pre-determined and is known as "House Ways." The Dealer must configure their hand into the two sets using this House Ways strategy.

# Emperor's Challenge...

One of the two variations between the Game and traditional Pai Gow Poker is that in the Game, each Participant's hand *may* consist of three sets of cards. The word "may" is used because the Emperor's Challenge method of play is optional for any of the Players unless they serve as the Player-Banker. In that event, the Player-Banker must use the third set of cards to complete their hand if any of the other Participants have chosen this option. In traditional Pai Gow Poker, to win their primary wager, a Participant's hand must contain two out of two winning sets of cards. However in the Game, a Participant's hand wins if any two out of their three sets win.

Each Player determines in advance whether or not they choose to play traditional two set Pai Gow Poker method or the three set method offered by the Game. This opportunity exists without the requirement of an additional wager by any Participant. If a Player chooses the Emperor's Challenge option, then in addition to the traditional two sets previously described, the Player and the Banker receives an additional two-card set for a total of three sets in their hand configuration. The third set of cards for both each Player and the Banker is selected at random from the four previously unused cards. All Players, (and the Dealer if they are not the Banker), use the two community cards as their third set to complete their hand.

The selection of the third set of cards is determined through a unique process known as Yin – Yang. The ideology of Yin and Yang is well known in Chinese culture and its understanding has spread throughout the world. The four previously undealt cards are split into two, two-card sets, one which

represents Yin ("Black") and the other Yang ("White"). The selection of whether the Yin set or the Yang set is a component of each Player's hand, is chosen at random using a single Yin / Yang die. It is important to note that with the Yin / Yang set, the Player enjoys the advantage because the rules are such that in the event the Yin set and the Yang set are of equal ranking, the Player's set wins over the Banker's set. Therefore, the Emperor's Challenge tiebreaker shall only be used in those casinos that charge a commission.

# Emperor's Treasure...

The second variation to traditional Pai Gow Poker is an optional proposition wager, known as "Emperor's Treasure," which is available to each Player and the Player-Banker to make before play begins. The proposition bet is independent of the primary bet. A Player can win on one and lose on the other. The Player wins their proposition bet if they have achieved a predefined hand ranking according to a posted paytable. In the event the Player's proposition wager equals or exceeds a certain pre-determined minimum, (e.g. five dollars), in addition to the posted paytable previously mentioned, their proposition wager qualifies for additional bonuses known as "Pai Gow Insurance." The proposition bet is always banked by the casino and paid by or collected by the Dealer.

# Summary...

The differences between the Game and traditional Pai Gow Poker may be summed up as follows:

- In the Game, the Participants may optionally use three sets of cards to comprise their hand instead of the usual two.
- To win their primary wager, a Participant must win two out of three sets in their hand.
- In the event any of the sets of cards possessed by a Player is of a ranking equal to the Banker's set, the Banker's set wins if this occurs on the first two sets and loses if this occurs on the third set (the Yin/Yang set).
- A proposition bet is available to any Player or Player-Banker if they believe their cards will match one of several pre-selected hand rankings posted at the game table. This wager is placed against the casino house bank only.
- If the proposition bet meets or exceeds a certain threshold amount, the wager qualifies for a bonus paytable known as Pai Gow Insurance.

#### **DEALING PROCEDURES**

# Equipment

 The Game is played at a blackjack-style table with a maximum of six Player positions on a custom Game layout. The Game uses one standard deck of fifty-two cards plus one Joker for a total of fifty-three cards. The Game may be hand dealt directly from the Dealer or from a shuffler/dispenser device. A dice cup containing a single die with three black and three white designations are used in determining the selection of the Yin or Yang.

#### Banker Procedures

- 2. If the casino allows for Player-Bankers, the opportunity to bank the game is offered to the Players. If any Player chooses to serve as the Player-Banker, a marker which reads "Banker" is placed in the wager position in front of the Player-Banker.
- 3. If no Player chooses to become the Banker, the Dealer serves as the Dealer-Banker.
- 4. If a Player-Banker is used, at the conclusion of each round of play, the Dealer must then act as Banker for one turn before returning to the next Player-Banker.

# Pre-deal procedures

- 5. Players place their primary wager in the designated primary bet area on the layout. This wager is required and must be within the minimum and maximum limits posted at the table.
- 6. If a Player has elected to be the Player-Banker, the Dealer places a wager equal to the last wager placed by the Player-Banker.
- 7. Each Player is required to declare whether they want their primary wager to be used to play standard Pai Gow Poker and play with two sets of cards, or play the "Emperor's Challenge" method and play with three sets of cards.
- 8. A specially marked button which designates "Emperor's Challenge" on one side and "Push Accepted" on the other is placed adjacent to the Player's primary wager signifying the Player's choice. If a Player-Banker is used, the Dealer must also signify they will participate in the Emperor's Challenge tiebreaker by placing the Emperor's Challenge button next to their wager.
- 9. Players may also, at their option, place an addition wager for the "Emperor's Treasure" proposition bet, which if placed, must be within the minimum and maximum limits posted at the table.
- 10.In the event a Player's "Emperor's Treasure" wager matches or exceeds a predetermined amount, (e.g. five dollars), a specially marked button which designates "Pai Gow Insurance" on both sides is placed next to the Player's proposition wager. This allows the Player

- to receive additional payoffs according to the paytable located on the game table surface.
- 11.A Player may optionally place a wager for the benefit of the Dealer. That wager is placed immediately in front of, (the Dealer's side), their primary wager, their proposition wager, or both.

### Dealing Pai Gow Poker game

- 12.After all Players have placed their wager(s) and the corresponding actions by the Dealer have been made, the Dealer begins play by determining which playing position, including the Dealer's, will receive their cards first. This may be determined by use of dice, a random number generator, or some other random device.
- 13.Beginning with the selected position, the Dealer deals to each Player position and to themselves, seven cards face down. The cards may be delivered to the positions in one of several methods depending upon whether the cards are hand dealt or if a shuffler/dealing device is utilized.
- 14. The Dealer proves there are four leftover cards by spreading them and then places them face-down onto the Yin/Yang symbol on the table layout in the following order. The top two cards are placed on the Yin and the bottom two cards on the Yang. The Yin/Yang button is placed on top of and straddles the two sets of cards to protect them during play.
- 15. Any cards that were delivered to any vacant position is collected by the Dealer and placed face-down into the discard rack.
- 16.Each Player splits their initial seven-card hand into two sets of cards a five-card set and a two-card set. The five card set must have a higher ranking than the two-card set otherwise the hand is considered "foul" and the Player loses. Each Player places each set of cards face down on the corresponding spot on the layout.
- 17.After all Players have configured their hands, the Dealer exposes the house hand and determines which five cards to play in their high hand and which two cards to play in their low hand according to a predetermined "house-way" strategy.
- 18.Beginning with the Player to the Dealer's immediate right, the Dealer compares each Player's two-card set to the Dealer's two-card set and each Player's five-card set to the Banker's five-card set. In the event the Player's and the Banker's corresponding card sets are of the same ranking, (a "copy"), the Banker's card set wins.
- 19.A Player wins their primary wager if both their two-card set and their five-card set is greater than the Banker's corresponding two-card set and five-card set. A Player loses their primary wager if both their two-card set and their five-card set is lower than or equal to the Banker's corresponding two-card set and five-card set. If neither the Player or the Banker can provide a hand with two winning sets, the result is a tie and the Player's wager results in a push unless the Player

- previously selected to receive a third set of cards so designated by the Emperor's Challenge button adjacent to their primary wager.
- 20.If a player placed a wager on the optional Emperor's Treasure proposition bet, (described later), the Dealer determines if the Player's hand qualifies for one of the winning combinations posted on the paytable. If it does, the Dealer pays the Player accordingly. If not, the Dealer collects the Player's proposition wager.

### Player-Banker Procedures

- 21.If a Player-Banker is used, hands are configured in the following order. First, all Players except the Player-Banker configures their hand. Once established, then Player-Banker configures their hand. Once the Player-Banker has established their hand, the Dealer reveals their hand and configures according to the House Ways strategy.
- 22. The Dealer then exposes the Player-Banker's hand and compares it to the Dealer's hand. If either set of cards is a "copy", the Banker set is ruled a higher ranking. If the Dealer's hand has won, the Dealer's wager is paid out of the Banker's fund. If the Banker wins, the Dealer forfeits their wager to the Banker, less a commission, (where applicable).
- 23.After the Player-Banker take or pay procedure, the Dealer places its hand into the discard rack and positions the Player-Banker's hand in front of the chip rack and where the Dealer previously displayed their cards.
- 24. Each Player's hand is compared to the Player-Banker's hand.

#### Emperor's Challenge method

- 25.If any Player previously elected to receive a third set of cards to complete their hand, and they have not already obtained the required two winning or losing sets, they are entitled to their third set of cards.
- 26. The Dealer delivers the Yin/Yang dice cup to the Player whose initial two-card set had the highest ranking among the Players seeking a third set of cards. During delivery, the Dealer rotates the dice cup with its cover on upside-down to assure the die has changed position from the last roll. If two or more such Players have identical rankings in their two card set, a comparison of those Players' five card set is made and the Player with the highest ranking shall receive the Yin/Yang dice cup. If these Players still have identical rankings, these Players may agree who will receive the dice cup. If no agreement is reached, the Yin/Yang dice cup is delivered to the Player whose highest card(s) in their hand is of a suit that is ranked as follows: Clubs, Diamonds, Hearts, Spades.
- 27. The Banker shall never receive the Yin/Yang cup. In the event only a Player/Banker and the Dealer are both eligible to receive the third set

- of cards, then the Dealer is eligible to receive the Yin/Yang dice cup. This is the only time the Dealer may shake the Yin/Yang dice cup.
- 28. The Player who receives the Yin/Yang dice cup may, at their option, pass it to another Player at the table, provided that, the other Player is not a Player/Banker. In the event the Dealer receives the Yin/Yang dice cup as described in paragraph 27 above, the Dealer may not pass the dice cup.
- 29. The Player with the dice cup shakes it and places it on the table game surface.
- 30. The Dealer removes the cover and determines if the top face of the die represents Yin (Black) or Yang (White). The outcome of the roll of the die determines which set of cards the remaining Players' hand will receive as their third set. The opposite set will be used by the Banker as their third set. When a Player-Banker is used, the Dealer plays the Player's set.
- 31.If a Player's third set has a lower ranking than the Banker, their hand is declared a loser. If a Player's third set has a higher ranking, it is declared a winner. If a Player's and Banker's third set are of an identical rank, the Player wins.

Take or pay procedure (For casinos not incorporating the Emperor's Challenge third set method.)

- 32.Beginning with the Player on the Dealer's immediate right and continuing in a counter-clockwise rotation, the Dealer shall determine whether each Player's hand is a loser, winner or a tie and will correspondingly take, pay or push each Player's wager. Winning primary wagers are paid one-to-one odds, also referred to as "even money." The Emperor's Treasure and/or Pai Gow insurance wagers are paid according to the odds posted on the paytable.
- 33.If the Player's hand is a loser, the Dealer removes the Player's wager and removes the Player's cards.
- 34.If the Player's hand is a winner, the Dealer takes no action on the Player's wager and leaves the Player's cards on the table surface.
- 35.If the Player's hand is a push, the Dealer taps their fist on the table surface signifying a push, leaves the Player's wager and removes the Player's cards.
- 36.After all hands have been acted upon, the Dealer then pays all winning wagers and concurrently removes each Player's cards.

Take or pay procedure (For casinos incorporating the Emperor's Challenge third set method.)

37.Beginning with the Player on the Dealer's immediate right and continuing in a counter-clockwise rotation, the Dealer shall determine whether each Player's hand is a loser, winner or a tie and will correspondingly take, pay or push each Player's wager. Winning primary wagers are paid one-to-one odds, also referred to as "even

- money." The Emperor's Treasure and/or Pai Gow insurance wagers are paid according to the odds posted on the paytable.
- 38.If the Player's hand is a loser, the Dealer removes the Player's wager and removes the Player's cards.
- 39.If the Player's hand is a winner, the Dealer pays each wager and removes each Player's cards.
- 40. If the Player's hand is a push and the Player elected to accept pushes, the Dealer taps their fist on the table surface signifying a push, leaves the Player's wager and removes the Player's cards. If the Player's hand is a push and the Player elected to participate in the Emperor's Challenge third set, the Dealer leaves the Player's wager and the Player's cards.
- 41.At the conclusion of this initial take or pay procedure, the cards associated with each Player who will participate in the Emperor's Challenge tiebreaker, are the only cards remaining on the table with the exception of the four leftover cards which are protected by the Yin/Yang button. Unless the Dealer is participating in the Emperor's Challenge tiebreaker against a Player-Banker, the Dealer's cards are delivered to the discard rack. If the Dealer is participating in the Emperor's Challenge tiebreaker against a Player-Banker, the Dealer's cards are collected together either face-up or face-down, (depending upon the casino's operating procedures), and placed beneath the Dealer's wager.

#### EMPEROR'S TREASURE

If a Player placed the optional proposition bet, their hand qualifies for a bonus payoff if any five of their seven cards in their two original sets obtains one of the hand rankings depicted on the paytable posted at the table. The following example is representative of a typical Emperor's Treasure paytable:

Hand Ranking	Pays
Five Aces	400
Royal Flush	150
Straight Flush	50
Four-of-a-Kind	25
Full House	5
Flush	4
Three-of-a-Kind	3
Straight	2

Actual paytables are included in Appendix "A"

#### PAI GOW INSURANCE

If a Player's Emperor's Treasure wager exceeds a predetermined minimum, (e.g. five dollars), their wager qualifies for the Pai Gow Insurance paytable

The following example is representative of a typical Pai Gow Insurance paytable:

Hand Ranking	Pays
Nine-High Pai Gow	40
Ten-High Pai Gow	5
Jack-High Pai Gow	1
Queen-High Pai Gow	Push

In qualifying for Pai Gow Insurance, the Ace is always considered high and the Joker always is considered an Ace.

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Mark Harris WSGC

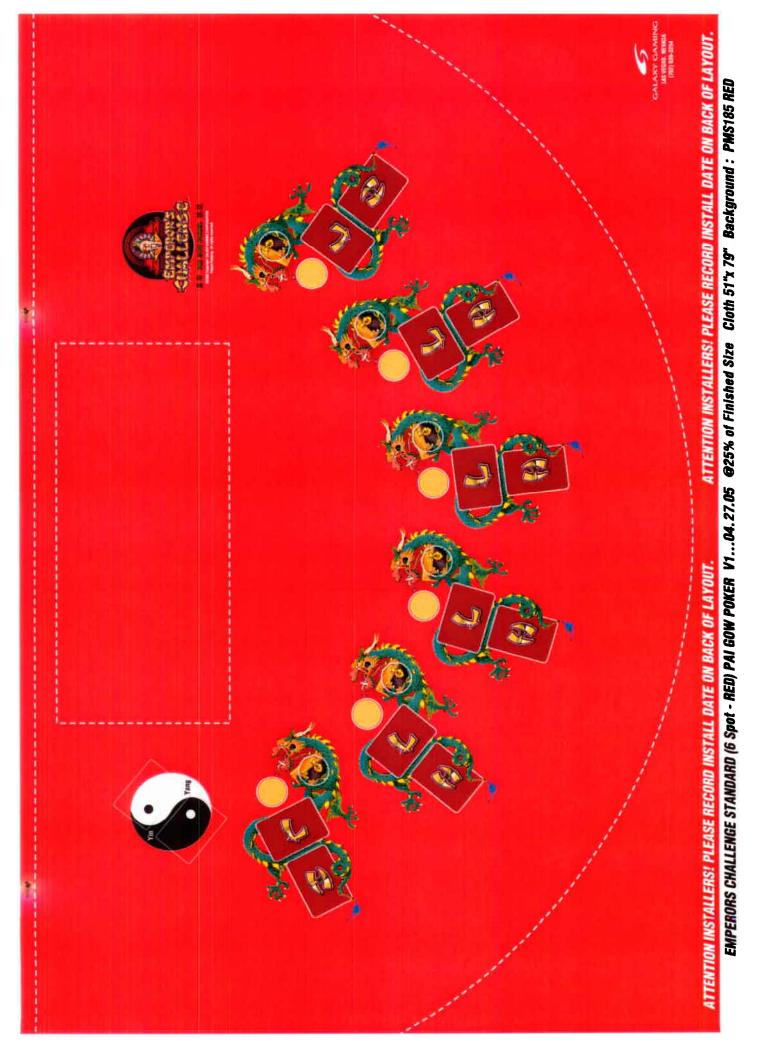
August 8<sup>th</sup> 2005

Dear Mr. Harris:

This short letter is to establish the fact that the Emperor's Challenge game may or may not require a maximum aggregate payout. Each operator will decide this. Thank you. If you have any questions regarding this you can reach me at 206-915-5963.

Yours truly,

Gary Saul Regional Manager Galaxy Gaming



Mark Harris WSGC

January 25, 2006

Dear Mark:

This letter is in response to the request of several cardrooms in Washington that desire to run Emperor's Challenge High Hand promotions. These High Hand promotions have shown to be very successful. We are delighted that many casinos have become creative in order to stimulate more business. We at Galaxy Gaming certainly give our approval to any licensed cardroom wishing to run High Hand promotions on Emperor's Challenge. If you have any further questions feel free to call me at 206-915-5963.

Yours truly,

Gary Saul Regional Manager Galaxy Gaming